

Aaron D. Shipley (NSBN 8258)
Karyna M. Armstrong (NSBN 16044)
McDONALD CARANO LLP
2300 West Sahara Avenue, Suite 1200
Las Vegas, Nevada 89102
Telephone: (702) 873-4100
ashipley@mcdonaldcarano.com
karmstrong@mcdonaldcarano.com

*Attorneys for Defendant Capital
One Auto Finance, A Division of Capital One,
N.A., erroneously sued as "Capital One
Financial Corporation"*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CARINA CORDERO,

Plaintiff,

v.

EXPERIAN INFORMATION SOLUTIONS,
INC.; NATIONAL CONSUMER TELECOM &
UTILITIES EXCHANGE, INC.; CLARITY
SERVICES, INC.;
BACKGROUNDCHECKS.COM LLC and
CAPITAL ONE FINANCIAL CORPORATION

Defendants.

CASE NO.: 2:24-cv-00592-JCM-MDC

**STIPULATION AND ORDER TO EXTEND
TIME FOR DEFENDANT CAPITAL ONE
AUTO FINANCE, A DIVISION OF
CAPITAL ONE, N.A. TO FILE
RESPONSIVE PLEADING TO
COMPLAINT
(FIRST REQUEST)**

Pursuant to Local Rules 6-1 and 6-2, Plaintiff Carina Cordero ("Plaintiff") and Defendant Capital One Auto Finance, A Division of Capital One, N.A., erroneously sued as "Capital One Financial Corporation," ("Capital One" and together with Plaintiff, the "Parties") stipulate and agree as follows:

1. Capital One's current deadline to file its responsive pleading to the Complaint is April 22, 2024;
2. Immediately upon being retained by Capital One, on the morning of April 18, 2024, counsel for Capital One reached out to Plaintiff's counsel to request additional time to file a responsive pleading;
3. The Parties agreed that good cause exists to extend the responsive pleading deadline by thirty (30) days to allow the newly engaged defense counsel to obtain and review a

copy of the file and gather additional facts and information while continuing to devote resources to exploring the potential for early resolution of this matter; and

4. The Parties agree to extend the deadline for Capital One to file a responsive pleading to the Complaint to May 22, 2024;

5. This stipulation is made in good faith and not for the purpose of delay.

NOW, THEREFORE, IT IS HEREBY STIPULATED THAT:

Capital One's time to file a responsive pleading to Plaintiff's Complaint is extended. Capital One shall file its responsive pleading on or before May 22, 2024.

DATED this 19th day of April, 2024.

McDONALD CARANO LLP

DATED this 19th day of April, 2024.

FREEDOM LAW FIRM, LLC

By: /s/ Karyna M. Armstrong

Aaron D. Shipley (NSBN 8258)
Karyna M. Armstrong (NSBN 16044)
2300 West Sahara Avenue, Suite 1200
Las Vegas, Nevada 89102

*Attorneys for Defendant Capital One
Auto Finance, A Division of Capital One,
N.A.*

By: /s/ Gerardo Avalos

George Haines (NSBN 9411)
Gerardo Avalos (NSBN 15171)
8985 South Eastern Ave., Suite 100
Las Vegas, NV 89123

Attorneys for Plaintiff

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATED: 4-24-24